

UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE

LG.PHILIPS LCD CO., LTD.,

Plaintiff,

v.

CHI MEI OPTOELECTRONICS
CORPORATION, et al.

Defendants.

C.A. No. 06-726-GMS

C.A. No. 07-357-GMS

CONSOLIDATED CASES

JURY TRIAL DEMANDED

**LG.PHILIPS LCD CO., LTD.'S ANSWER TO
AU OPTRONICS CORPORATION AMERICA'S
ADDITIONAL COUNTERCLAIMS**

Defendant LG.Philips LCD Co., Ltd. ("LPL"), by and through its undersigned counsel, hereby files its Answer in Response to the Additional Counterclaims of Plaintiff AU Optronics Corporation America ("AUOA"), in the above titled action (D.I. 135)

RESPONSE TO ALLEGATIONS AS TO THE COUNTERCLAIM PARTIES

1. LPL admits that AUOA is a corporation organized under the laws of California with its principal place of business in San Jose, California as alleged in paragraph 33 of the Counterclaims.
2. LPL admits the allegations of paragraph 34 of the Counterclaims.
3. LPL admits the allegations of paragraph 35 of the Counterclaims.
4. The allegations in paragraph 36 of the Counterclaims are conclusions of law to which no response is required.
5. The allegations in paragraph 37 of the Counterclaims are conclusions of law to which no response is required.

RESPONSE TO ALLEGATIONS AS TO JURISDICTION AND VENUE

6. LPL admits that this Court has jurisdiction over these Counterclaims, but the remaining allegations of paragraph 38 of the Counterclaims are conclusions of law to which no response is required.

7. LPL admits the allegations of paragraph 39 of the Counterclaims.

RESPONSE TO COUNTERCLAIM COUNT FOUR

8. LPL refers and incorporates herein its responses to AUOA's allegations in paragraphs 1-7, above, as though fully set forth herein.

9. LPL admits the allegations in paragraph 41 of the Counterclaims.

10. LPL denies the allegations in paragraph 42 of the Counterclaims.

11. LPL denies the allegations in paragraph 43 of the Counterclaims.

12. LPL denies the allegations in paragraph 44 of the Counterclaims.

13. LPL denies the allegations in paragraph 45 of the Counterclaims.

RESPONSE TO COUNTERCLAIM COUNT FIVE

14. LPL refers and incorporates herein its responses to AUOA's allegations in paragraphs 1-13, above, as though fully set forth herein.

15. LPL denies the allegations in paragraph 47 of the Counterclaims.

16. LPL denies the allegations in paragraph 48 of the Counterclaims.

17. LPL denies the allegations in paragraph 49 of the Counterclaims.

18. LPL denies the allegations in paragraph 50 of the Counterclaims.

RESPONSE TO ALLEGATIONS AS TO EXCEPTIONAL CASE

19. LPL denies the allegations in paragraph 51 of the Counterclaims.

RESPONSE TO PRAYER FOR RELIEF

As to paragraphs A through I of the Prayer For Relief, LPL denies that AUOA is entitled to the requested relief.

September 14, 2007

THE BAYARD FIRM

/s/ Richard D. Kirk (rk0922)

Richard D. Kirk (rk0922)

222 Delaware Avenue, Suite 900

P.O. Box 25130

Wilmington, DE 19899

(302) 655-5000

Attorneys for Defendant/Counterclaim-
Plaintiff LG.Philips LCD Co., Ltd.

OF COUNSEL:

Gaspare J. Bono

R. Tyler Goodwyn

Lora A. Brzezynski

McKenna Long & Aldridge LLP

1900 K Street, NW

Washington, D.C. 20006

(202) 496-7500

CERTIFICATE OF SERVICE

The undersigned counsel certifies that, on September 14, 2007, he served the foregoing documents by email and by hand upon the following counsel:

Edmond D. Johnson
Thomas H. Kovach
PEPPER HAMILTON LLP
1313 Market Street, Suite 5100
PO Box 1709
Wilmington, DE 19899-1709

Karen L. Pascale
John W. Shaw
YOUNG CONAWAY STARGATT &
TAYLOR, LLP
The Brandywine Building
1000 West Street, 17th Floor
P.O. Box 391
Wilmington, DE 19899-0391

Philip A. Rovner
Dave E. Moore
POTTER ANDERSON & CORROON LLP
1313 North Market Street
Wilmington, DE 19899-0951

William E. Manning
Jennifer M. Becnel-Guzzo
BUCHANAN INGERSOLL & ROONEY
The Brandywine Building
1000 West Street, Suite 1410
Wilmington, DE 19801

The undersigned counsel further certifies that, on September 14, 2007, he served the foregoing documents by email and by U.S. Mail upon the following counsel:

John N. Zarian
Samia McCall
Matthew D. Thayne
STOEL RIVES LLP
101 S. Capitol Blvd., Suite 1900
Boise, ID 83702

Vincent K. Yip
Peter J. Wied
Jay C. Chiu
PAUL, HASTINGS, JANOFSKY &
WALKER LLP
515 South Flower Street
Twenty-Fifth Floor
Los Angeles, CA 90071

Kenneth R. Adamo
Robert C. Kahr
Arthur P. Licygiewicz
JONES DAY
North Point
901 Lakeside Avenue
Cleveland, OH 44114-1190

Bryan J. Sinclair
Karineh Khachatourian
BUCHANAN INGERSOLL & ROONEY
333 Twin Dolphin Drive, Suite 700
Redwood Shores, CA 94065-1418

Ron E. Shulman, Esquire
Julie Holloway, Esquire
WILSON SONSINI GOODRICH & ROSATI
650 Page Mill Road
Palo Alto, California 94304-1050

James R. Troupis, Esquire
Paul D. Barbato, Esquire
MICHAEL BEST & FRIEDRICH LLP
One South Pinckney Street
Suite 700
P.O.Box 1806
Madison, WI 53701-1806

M. Craig Tyler, Esquire
Brian D. Range, Esquire
WILSON SONSINI GOODRICH & ROSATI
8911 Capital of Texas Highway North
Westech 360, Suite 3350
Austin, Texas 78759-8497

/s/ Richard D. Kirk, (rk0922)
Richard D. Kirk